

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., et al.,

Debtors.

Chapter 11

Case Nos. 01-1139 through 01-1200 (JKF)
(Jointly Administered)

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS, et al.,

Plaintiffs,

v.

SEALED AIR CORPORATION and
CRYOVAC, INC.,
Defendants.

Adv. No. 02-2210
[LEAD DOCKET]

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS, et al.,

Plaintiffs,

v.

FRESENIUS MEDICAL CARE
HOLDINGS, INC. and
NATIONAL MEDICAL CARE, INC.,

Defendants.

Adv. No. 02-2211

Affects Dockets 02-2210 and 02-2211

Hearing Date: March 21, 2005 @12:00 p.m.

MOTION TO SHORTEN NOTICE

The Official Committee of Property Damage Claimants (the “PD
Committee”), by and through its undersigned counsel, respectfully moves this Court,

pursuant to Rules 2002 and 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Bankruptcy Rule 9006-1(e) (the “Local Rules”), for an order providing that notice of the Motion for Entry of Order Approving Fee Applications and Allowing the Payment of Holdbacks (the “Motion”), filed on February 15, 2005, be approved and shortened as set forth below.

The PD Committee requests that this Court exercise its discretion and enter an order shortening the thirty-two (32) day notice period required by this Court’s February 8, 2005 Amended Order Establishing Case Management Procedures and Hearing Schedule (the “Amended Case Management Order”) to a thirty-one (31) day notice period to enable the PD Committee to present its Motion at the next omnibus hearing scheduled for March 21, 2005 at 12:00 p.m. and (b) maintaining the deadline for parties in interest to file any objection to the Motion for March 4, 2005 at 4:00 p.m. (as provided in the listing of omnibus hearing dates and applicable objection deadlines at docket no. 6833).

The PD Committee has served the Motion upon counsel for the Debtors, the United States Trustee, and counsel for the Official Committees by hand delivery or facsimile, and all other parties were served by first class mail. In light of these circumstances, the PD Committee respectfully submits that: (i) sufficient cause exists for the reduction of the notice period proposed hereby and (ii) no party in interest will be prejudiced if the notice period is shortened as requested herein. Interested parties will still have seventeen (17) days to respond to the Motion which complies with this Court’s Amended Case Management Order.

WHEREFORE, the PD Committee respectfully requests the entry of an order shortening the time for notice and providing such other and further relief as is just and proper.

Dated: February 15, 2005

FERRY, JOSEPH & PEARCE, P.A.

/s/ Theodore J. Tacconelli
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